

Nebraska Balance of State CoC NOFA Competition Policies for Ranking and Reallocation 2016

1. **Renewal of Grants**

- a. The CoC will renew expiring CoC funded grants provided that:
 - i. There is a continuing need in the CoC for project and the services provided to homeless people
 - ii. The project has satisfactory performance in terms of meeting the performance targets set by the CoC (projects must receive a minimum score of 50 out of a possible 100 to be considered satisfactory)
 - iii. The grantee has regularly contributed data to HMIS and the data is of adequate quality
 - iv. There have been no significant unresolved monitoring findings
 - v. The grantee has substantially expended prior grant funds (no more than 10% of contract funds were unexpended)
 - vi. The grantee is participating in the CoCs coordinated entry process
- b. Ranking of renewal grants
 - i. The CoC will rank the grants for renewal in a priority order according to their performance scores. Grants with the lowest performance scores will be ranked in Tier 2. Grants that are not comparable but essential to the CoC – HMIS and SSO grants for Coordinated Entry – will be ranked in Tier 1.

2. **Reallocation of Grants**

- a. Grantees are strongly encouraged to review their programs. Transitional Housing projects in particular should assess whether:
 - i. There is continuing need for the project
 - ii. The project is succeeding in accomplishing CoC outcomes
 - iii. The project is targeted to a population in transition
- b. Grantees with projects with satisfactory performance may voluntarily reallocate their project to a higher priority need (permanent housing)
 - i. Grantees voluntarily reallocating will be able to retain the current HUD dollar commitment to be used for the reallocated project
- c. Grantees that are not meeting the CoC determined performance benchmarks are at risk of having their funding involuntarily reallocated to a new project and provider
 - i. Projects scoring below 50 points on the renewal evaluation for two consecutive years will not be renewed. Funding for these projects will be reallocated.
 - ii. Projects that have under-expended their HUD grants by more than 10% will have their grants reduced by the amount in excess of 10% that was not expended in the prior grant term.

- d. Any CoC funding that is involuntarily reallocated will be made available to other eligible applicants in the CoC through a competitive process (described below under New Funding).
 - i. Grantees may reapply for funding that was involuntarily reallocated but must demonstrate in their applications that performance issues in prior grant will not impact the new grant request.

3. New Funding

- a. New funding includes: funds from reallocation and bonus funding.
 - i. Projects that qualify for and pursue a voluntary reallocation will not have to compete to retain those funds.
- b. All new funds will be competitively awarded except as noted above.
- c. The CoC will proactively engage in outreach to potential providers and seek to engage the participation of new organizations, in particular those serving underserved populations in the CoC
- d. New project applications will be developed and submitted in HUD's E-SNAPS grant management system.
- e. Applicants for funds will be reviewed according to an objective scoring rubric, approved in advance by the CoC.
- f. Applications will be reviewed and scored by the new project/renewal evaluation committee provided that any member of the committee that has any interest in any application being submitted may not participate in those discussions. For the purpose of reviewing new project applications, if a member of the New Project/renewal evaluation committee has any conflict with respect to any application, he/she shall recuse him/herself and ask that his/her CoC appoint a replacement who has no conflict to serve on the committee for the purpose of reviewing new applications submitted.
- g. Project applicants achieving the highest scores will be selected.
- h. New project applications will be ranked below the renewal applications. By approving a project for renewal, the CoC has affirmed that the project is meeting a critical need of the CoC. Failure to receive renewal funding will cause harm to homeless families currently served and could force some participants to return to homelessness.

4. Transitional Housing Priorities

- a. The following are the target populations to be served by transitional housing:
 - i. Youth
 - ii. Persons seeking to continue recovery in recovery-focused housing
 - iii. Institutional re-entry (may not be eligible for CoC funding but needed from people leaving criminal justice and mental health facilities)
 - iv. Persons fleeing domestic abuse or violence where it is not possible to find units for rapid rehousing
- b. Transitional housing grants successfully meeting performance standards and serving a priority population will continue to be eligible for renewal.
- c. Transitional housing projects not serving a target population will be encouraged to reallocate to a permanent housing project. In future CoC competitions, TH projects not serving a priority population may be required to reallocate.

5. Permanent Supportive Housing and Housing First

- a. Housing First. Providers of permanent supportive housing shall use the Housing First model as outlined below. Any new projects funded by the CoC must use the Housing First model. Any existing permanent supportive housing project that has indicated in application to HUD that it employs the Housing First model must follow the standards as set forth below. Existing permanent supportive housing projects that have not indicated Housing First are 'grandfathered' from this policy.
- b. Housing First projects defined:
 - i. Housing is not contingent on compliance with services – participants are provided with a standard one year lease agreement. The lease agreement can only be terminated in accordance with the State of Nebraska Uniform Residential Landlord and Tenant Act (76-1401 to 76-1449)
 - ii. Participants are provided with services and supports to help maintain housing and prevent eviction.
 - iii. There is no requirement for sobriety prior to being offered housing and admission shall not be conditioned on credit or background checks. Criminal backgrounds will be considered only to the extent necessary to protect safety and well-being.
 - iv. Participants shall be given choice in their housing subject to program limitations.
 - v. Participants are not required to participate in services but providers are required to persistently and consistently seek to engage participants.
 - vi. Providers are encouraged to support staff in implementing Evidence Based Practices that support Housing First (Critical Time Intervention, Motivational Interviewing, Stages of Change)

6. Prioritization of Chronic Homeless in Permanent Supportive Housing

- a. The CoC will follow the prioritization of persons and families for permanent supportive housing according to the Notice issued by HUD (CPD-14-012). This prioritization policy will be used to determine referrals to permanent supportive housing through the MVRT (Most Vulnerable Review Team). Specifically, the CoC adopts the following Order of Priority for CoC Funded Permanent Supportive Housing:
 - i. First Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.
 - ii. Second Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness.
 - iii. Third Priority—Chronically Homeless Individuals and Families with the Most Severe Service Needs
 - iv. Fourth Priority—All Other Chronically Homeless Individuals and Families
- b. Referrals to all PSH units in the CoC will be made through the MVRT process.
- c. CoC funded PSH providers will not maintain separate waiting lists for available units; there will be a single consolidated list through the MVRT process.
- d. Participation in the MVRT process is mandatory for all CoC funded PSH projects.

7. Prioritization of Non-Dedicated Permanent Supportive Housing Beds for Chronically Homeless.

- a. All permanent supportive housing beds will be filled through the MVRT coordinated entry process.
- b. Providers must inform the MVRT of any vacancy in any CoC funded PSH project.

- c. Beds may only be filled by participants referred by the MVRT team.
- d. All referrals will follow the Order of Priority as specified above.

8. Grievance Policy

- a. It is the intent of the CoC to conduct the competition in a fair, equitable and transparent manner.
- b. A grievance may be filed by any applicant organization that claims it has been adversely affected by:
 - i. Improper application of rules, regulations and procedures concerning participation in the Consolidated Grant application process;
 - ii. Improper interpretation of rules, regulations and procedures concerning participation in the Consolidated Grant application process;
 - iii. Disparity in the application of rules, regulations and procedures regarding participation in the Consolidated Grant application process;
 - iv. Violation of rules, regulations or procedures concerning participation in the Consolidated Grant application process;
 - v. The score assigned to the application
- c. Grievances must be made in writing to the CoC with three working days of the event that triggered the grievance. The grievance must be specific regarding the alleged violation.
- d. The CoC will review all grievances within three working days and provide a written response.
- e. The officers of the CoC will serve as the Grievance Committee of the CoC.
- f. Applicant organizations not satisfied with the CoC response may submit an appeal to HUD under 24 CFR 578.

These policies for the 2016 CoC NOFA were approved by the Board of the Nebraska Balance of State CoC on: July 13, 2016

NE Balance of State CoC – 2016 NOFA New Project Scoring Criteria

1. Applicant Experience: _____ of 30

Applicant and sub-recipient(s)' prior experience in serving homeless people and in providing housing similar to that proposed in the application.

2. Project Quality: _____ of 30

- a. Project follows Housing First, has a sound plan to maintain households in permanent housing, or place households in other permanent housing
- b. Project has a plan to ensure that participants will be able to access mainstream resources and to increase the amount of earned and benefit income received by participants.

3. Outreach to Eligible Applicants _____ of 15

- a. Project prioritizes people entering from literally homeless situations (streets or shelters)
- b. Project agrees to participate in coordinated entry.

4. Accuracy of Budgets/Charts _____ of 25

- a. Application as submitted in E-SNAPS is consistent, meets regulatory requirements, and all required information is accurate and complete.

Final Total Score for Project _____ of 100

NE BALANCE OF STATE COC POLICIES FOR RANKING AND REALLOCATION 2016 NOFA COMPETITION

Renewal Performance Evaluation Criteria	Unit Type	Source	Proposed Benchmark/ Standard		2015 Actual Performance		Comments	2016 Points
PERFORMANCE			PH	TH	PH	TH		
1. Occupancy/Utilization (Average of 4 reported PIT counts)	Average Point in Time	APR	90% = 10, 85-89% = 5		104%	84%	Grantees exceeded or came close to mark; keep as is?	10
2. For program entrants, at least one adult per household w/previous residence that indicates literal homelessness	All Adults	APR	100% PSH	70% (RRH and TH)	67%	43%	Substantially missed for both; not a clear requirement for TH - is required for PH-	10
3. Percentage of all adult participants who gained or increased EARNED income from entry to exit/follow-up (leavers and stayers)	Adults - Leavers	APR	10%	40%	27%	52%	Can change to all adult participants, not just leavers. Consider raising PH to more closely reflect performance	10
4. Percentage of all adult participants who gained or maintained OTHER (non-employment) income from entry to exit/follow-up (leavers and stayers)	Adults - Leavers	APR	25%	25%	24%	28%	Grantees exceeded or came close to mark; keep as is?	10
5. Percentage of adult participants with non-cash benefits (health insurance, food stamps, etc.)	All Adults	APR	70%		93%	81%	Consider increasing standard since all exceeded: 90% PH, 80% TH?	10
6. Percentage of all participant leavers who exited to shelter, streets or unknown	Participants - Leavers	APR	Less than or equal to 10%		2%	3%	Consider increasing standard since all exceeded: Less than or equal to 5%??	10
7. Spending of last year's HUD grant	N/A	APR	100% = 10; 95-99% = 8; 90-94% = 4		92%	98%	Consider maintaining standard	10
8. PSH Programs: Percentage of all leavers who remain in PSH or exited to PH	Participants - Leavers	APR	90%	n/a	90	n/a	Standard was met on average; consider maintaining standard	10
9. TH & RRH Programs: Percentage of all leavers who exited to Permanent Housing	Participants - Leavers	APR	85%	80%	100%	87%	Consider raising standards: 90% RRH, 85% TH	10
10. TH Only - Length of stay for all participants is 1 year or less	All Participants	APR	n/a	75%	n/a	40%	Systemwide performance measure is average length of time homeless - long stay TH projects increase this	None*
11. RRH Only - Length of stay for all participants is 6 months or less	All Participants	APR	85%	n/a	100	n/a	all met this standard; should this be continued?	None*
Performance total score								80
CONSUMER SURVEYS								
12. Consumer Surveys - Response Rate	All Adults	CS	35%		100%	100%	Should this continue - like the idea of surveying consumers but all get the points	5
13. Consumer Surveys - Results	N/A	CS	30 Points or greater		100%	100%		5
Consumer Surveys total score								10
COMPLIANCE								
14. Match equals or exceeds requirement	N/A	APR	100%				Don't have the outcomes for these; consider maintaining as is	5
15. Monitoring - HUD Findings	N/A	Provider Report	No findings or all issues/findings resolved					5
16. HUD Drawdown within 90 days	N/A	Provider Report	<91 days					5
Compliance total score								15
HMIS								
17. HMIS Universal Data Elements null/unknown	All Participants	APR/HMIS	<=5%				Again, don't have last year's outcome but should probably be continued.	5
HMIS total score								5
Grand Total								110